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REMARKS

Reconsideration is requested in view of the following remarks. Claim 4 is amended; the amendment is supported by the original disclosure, for example, at page 10, lines 25-30 and Figures 5 and 6. Claim 5 is amended; the amendment is supported by the original disclosure, for example at page 10, lines 21-24 and Figure 8. Claims 11-16 are canceled without prejudice or disclaimer. New claims 17-20 are added, and are supported by the original disclosure, for example page 12, lines 1-24 and Figures 2-4 and 8. Claims 1-10 and 17-20 are pending in the application.

Deletion of Inventors Under 37 CFR 1.48(b)

As a result of the cancellation of claims 11-16, a request is being filed herewith requesting the deletion of Eric Stender and David Wickstrom as inventors under 37 CFR 1.48(b).

Examiner Interview

Applicants note with appreciation the telephonic interview that took place on October 11, 2006 between the Examiner and Applicants representative, Mr. James A. Larson. During the interview, the meaning of "fastenerless mechanism" and "fastenerless assembly" were discussed, with Applicants referring to page 7, lines 26-28 for the definitions of these terms. No agreement was reached concerning allowable subject matter.

35 USC 112 Rejections:

Claims 1-10 are rejected under 35 USC 112, second paragraph, as being indefinite.

Claims 1-3 and 9 are rejected as being indefinite in regards to the term "fastenerless" as used in the language of a "fastenerless mechanism" and "fastenerless assembly". In the specification, the term "fastenerless" is explicitly defined as "no screws, bolts, or rivets are used to connect the mechanism to the printer" (i.e. fastenerless mechanism) or "to interconnect any elements of the mechanism", (i.e. fastenerless assembly) (see page 7, line 26-page 8, line 2 and page 11, lines 26-29). The specification

describes one embodiment of a fastenerless mechanism, in which the modular card reorienting mechanism is connected to the card processing machine via a snap-fit method (see page 17, lines 7-25). However, it will be appreciated that other methods could be used to form a fastenerless mechanism or assembly.

Since Applicant's specification explicitly defines the meaning of "fastenerless", that meaning must be applied when interpreting the claims.

In the Examiner's interview summary mailed October 13, 2006, the Examiner suggests that this terminology does not define any specific structure, given its broadest reasonable interpretation would be met by anything which serves to connect the elements, and is unclear because no specific structure is claimed. The specification specifically defines the meaning of these two terms so the claims must be interpreted using those definitions. The broadest reasonable interpretation that is applied must also be consistent with the definitions specifically defined by Applicants. Since the specification defines the meaning of these terms, the Examiner is incorrect that anything that connects the elements would meet the claim language.

Claim 4 is rejected as being indefinite for not clearly defining the relationship between the wrap spring and the clutch mechanism. Claim 4 is amended to recite that the wrap spring is connected to the card reorienting device. The clutch mechanism is part of the drive train between the electric motor and the card reorienting device. The specification clearly describes how the clutch mechanism, card reorienting device and the wrap spring function. Withdrawal of the rejection is requested.

Claim 5 is rejected as being indefinite for not clearly defining the way the recited "member" biases the clutch mechanism. Claim 5 now recites that the member is engaged with the clutch mechanism to apply a biasing force to the clutch mechanism. The specification clearly describes this concept.

Withdrawal of the rejections is requested.

35 USC §102(b) Rejections:

Claims 1, 3, 6, 7 and 9 are rejected under 35 U.S.C. §102(b) as anticipated by Kobayashi (US Patent No. 5,771, 058). Applicants respectfully traverse this rejection.

Claims 1 is directed to a modular card reorienting mechanism for use in a card processing machine and requires, among other features, a chassis including a fastenerless mechanism for detachably connecting the chassis to the card processing machine.

Claim 9 is also directed to a modular card reorienting mechanism for use in a card processing machine. Claim 9 requires that the chassis, the electric motor, the card reorienting device and the drive train form a fastenerless assembly. As discussed above, the "fastenerless mechanism" and the "fastenerless assembly" are defined explicitly in the specification on page 7, line 26-page 8, line 2 and page 11, lines 26-29.

Kobayashi does not disclose at least these features. Therefore, a prima facie case of anticipation has not been established. In particular, nowhere does Kobayashi disclose a modular card reorienting mechanism in which the chassis includes a fastenerless mechanism for detachably connecting the chassis to a card processing machine. Furthermore, nowhere does Kobayashi disclose a modular card reorienting mechanism wherein the chassis, the electric motor, the card reorienting device and the drive train form a fastenerless assembly. Kobayashi is silent as to how any of the structures are connected and assembled within the printing system. Kobayashi could use fasteners to achieve connection, in which case Kobayashi would not disclose a fastenerless mechanism or a fastenerless assembly.

Therefore, Kobayashi cannot anticipate claims 1 and 9. Claims 3, 6 and 7 depend from claim 1 and are patentable along with claim 1 and need not be separately distinguished at this time.

New claims 17-20 are patentable over the cited art of record, including Kobayashi. Kobayashi does not disclose the use of first and second shafts, a hook and a resilient arm to connect a card processing mechanism adjacent to a rear end of a card processing machine.

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CONCLUSION

Applicants respectfully request a Notice of Allowance. If a telephone conference would be helpful in resolving any issues concerning this communication, please contact Applicants' primary attorney-of record, James A. Larson (Reg. No. 40,443), at (612) 455-3805.

Respectfully submitted,

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